

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR	)	Civil Action
PRESIDENT, INC.; <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
v.	)	No.: 4:20-cv-02078
	)	
Kathy Boockvar; <i>et al</i> ,	)	
	)	
Defendants.	)	Judge Matthew W. Brann

**MOTION TO DISMISS THE COMPLAINT AND JOINDER OF MOTION  
TO DISMISS THE COMPLAINT OF NORTHAMPTON COUNTY BOARD  
OF ELECTIONS OR, IN THE ALTERNATIVE, DISMISS PENDING  
STATE-COURT RESOLUTION OF STATE-LAW QUESTIONS**

Defendant, the Northampton County Board of Elections, moves to join the Motion of all Co-Defendants requesting an Order dismissing all claims in the Complaint with prejudice or, in the alternative, dismissing all claims pending a final ruling by the Pennsylvania judiciary on the proper construction of the Pennsylvania Election Code provisions at issue for the reasons set forth in Movant's accompanying Brief as well as the Memoranda of Law filed by all Co-Defendants. In support of this Motion, Movant relies upon its accompanying Brief as well as the Memoranda of Law filed by all other Co-Defendants.

Respectfully submitted,

COUNTY OF NORTHAMPTON

By: /s/ Timothy P. Brennan  
Attorney ID: 91798  
Assistant Solicitor  
County of Northampton  
669 Washington Street  
Easton, PA 18042  
610-829-6350  
[tbrennan@northamptoncounty.org](mailto:tbrennan@northamptoncounty.org)

By: /s/ Brian J. Taylor, Esq.  
Attorney ID: 66601  
Assistant Solicitor  
County of Northampton  
669 Washington Street  
Easton, PA 18042  
610-829-6350  
[btaylor@northamptoncounty.org](mailto:btaylor@northamptoncounty.org)

Date: November 12, 2020